Status as of last Weekly Progress Report 5/4/16 <u>immediately following termination of Extraction</u> <u>System</u>

ST12 Steam Enhanced Extraction: Has criteria for termination of Steam Injection Been Met?

I. <u>Criteria for amount of steam to be injected:</u>

Final RD/RAWP (May 2014): Table 4-2: SEE to EBR Transition Criteria

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Steam injection (guideline)	319,357,000 lbs	Numerical thermal modeling of TTZs.	A targeted total of 319,357,000 lbs of steam is expected to be injected into the TTZ over the course of operations. This represents an average flushing of the TTZ pore volume of 1.6 pore volumes of steam as water throughout operation. Actual steam required to achieve the other criteria may be more or less than this estimate. Because this parameter does not directly measure remediation performance its primary use will be as a guideline to measure progress compared to the design.

Minter

Table 5-2 SEE to EBR Transition Criteria Monitoring

Parameter	Target Criteria	Summary of Monitoring or Sampling and Analysis for Evaluation of Progress Toward Transition Criteria
Steam	319,357,000	Steam production will be measured at the boilers.
injection	lbs	
(guideline)		

Montes

Weekly progress report as of 5/4/16

-	Total Steam Injected	302.4	million pounds (lbs)
00000	Projected Total Steam Injection	320	million lbs
8	Steam Injected Vs Projected	94	%
- 00		200000000000000000000000000000000000000	

Analysis: Status remains unchanged since shutdown of the steam injection system in early March. Criteria for amount of steam injection has not been 100% met. The design steam injection rate was based on 1.6 pore volumes of steam injection, which is lower than the commonly used criteria of 2 pore volumes of steam. The projected steam injection should be seen as a minimum amount of steam to be injected. Note actually energy usage was 53% of projection as of 5/4/16:

Estimated Total Energy Usage	11 242 000	kilowatt hours (kWh)
Total Energy Used	6,025,716	kWh
Used Electrical Energy vs. Estimate	53	%

II. <u>Criteria for residual benzene concentrations:</u>

Final RD/RAWP (May 2014): Table 4-2: SEE to EBR Transition Criteria

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Berzene	100 to 500	Concentration	Benzene concentrations in extracted
concentrations:	µg/L	range where	groundwater provide an indication of the
		natural	amount of benzene remaining in the TTZ.
		attenuation can	These concentrations will be monitored
		complete	against a target benzene concentration in the
		degradation	100 to 500 μg/L range within the TTZ. This
		within the	concentration range is predicted to achieve
		remedy time	deanup levels within the 20-year remedial
		frame.	timeframe based on modeling of groundwater
			contaminant attenuation outside the TTZs
			after active EBR (Appendix E). Benzene
			located around the perimeter of the TTZ and
			the perimeter/interior extraction wells will be
			evaluated for benzene concentrations to
			identify any perimeter influx that may mask
			benzene removal within the TTZ. It is
			expected that lower benzene concentrations
		Total Control of the	within this range will be achieved in the
			interior of the TTZs than at the perimeter.
		1	

Table 5-2 SEE to EBR Transition Criteria Monitoring:

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Benzene	100 to 500	Benzene concentrations will be monitored in SEE wells during
concentrations	µg/L	baseline sampling. Samples of extracted water (see Table 5-1) will be used to evaluate benzene concentrations during SEE operation. Sampling locations during operation will be determined in the field with a sampling strategy that starts at influent to the liquid treatment system and then moves progressively out to individual manifolds and, in some cases individual wells to trace the source of benzene contribution. The
		locations will also be selected to evaluate the relative
		contribution of contamination from outside vs. inside the TTZs.

Analysis: EPA considers 500 μ g/l of benzene in groundwater an appropriate target for a successful remediation, and would not support terminating steam treatment before the stated target (100 – 500 μ g/l) is reached

Progress Report Steam Enhanced Extraction Remediation at the Former Williams AFB ST012 Site, Mesa, A2 May 4, 2018

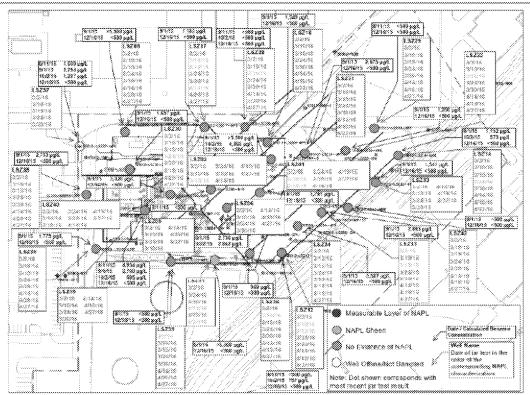


Figure 27. NAPL Screening Results and Calculated Benzene Concentrations - Lower Saturated Zone

LSZ Is looking good, although it appears that LNAPL was continuing to be recovered from outside the southern perimeter; helping to attain long term RAO at the time the extraction system was shut off.

Weekly progress report 5/4/16: UWBZ

Progress Report

Steam Enhanced Extraction Remediation at the Former Williams AFB ST012 Site, Mesa, AZ.

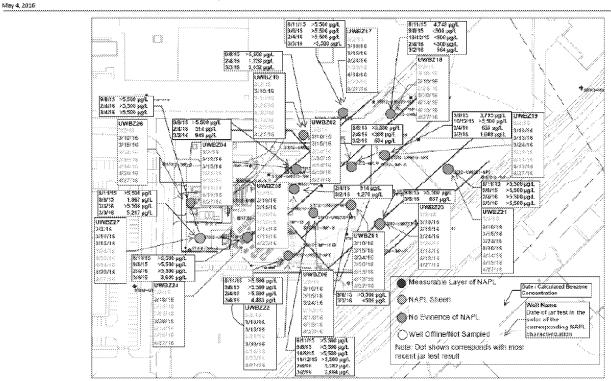


Figure 26. NAPL Screening Results and Calculated Benzene Concentrations - Upper Water Bearing Zone

Extraction system was still effectively removing LNAPL at time it was shut down. Benzene Concentrations in UWBZ still exceed 500 μ g/L; Criteria has not been met for UWBZ

Weekly progress report 5/4/16 CZ

Progress Report
Steam Enhanced Extraction Remediation at the Former Williams AFB ST012 Site, Mesa, AZ
May 4, 2016

20. NAPL Screening Results and Calculated Benzene Concentrations

Figures 25-27 below present the screening level results for NAPL detected in samples collected from MPE wells across the site. Screening samples are typically collected on a weekly basis. The figures below also include calculated benzene concentrations of groundwater samples collected from MPE wells across the site.

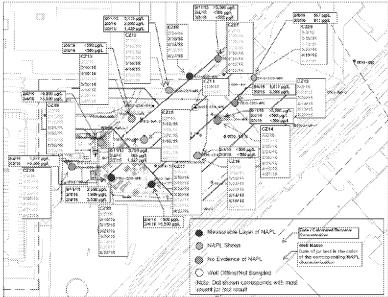


Figure 25, NAPI, Screening Results and Calculated Benzene Concentrations - Cobble Zone

SEE was successfully removing LNAPL but benzene concentrations still Exceed 500 $\mu g/L$ in CZ at the time extraction system was terminated, SEE Termination Criteria has not been met for CZ. The Cobble Zone is also more highly transmissive and remaining contaminants will spread as water table rebounds.

III. Criteria for Mass Removal

Final RD/RAWP (May 2014):

Table 5-2 SEE to EBR Transition Criteria Monitoring:

	1	makes produced regionals.
Mass removal	Less than 10 percent of peak removal rate	Mass removal will be determined from a sum of individual mass removal rates such as: Recovered LNAPL as measured by totalizing flow meter on the inlet to the LNAPL storage tanks Mass in extracted vapors as measured at vapor collection manifold (vapor flow rate logged in PLC and influent vapor measured by FIDIPID) Mass in extracted water as measured in air stripper off
_		 Mass in extracted water as measured in air stripper off gas and liquid laboratory samples (liquid discharge flow rate logged in the PLC, air stripper blower flow rate logged in the PLC, air stripper off gas measured by FID/PID, water treatment influent and GAC influent)

Final RD/RAWP (May 2014): Table 4-2: SEE to EBR Transition Criteria

L	<u> </u>	1	
Mass removal	Less than 10	10 percent	The rate of contaminant mass removal from
	percent of	selected as an	the subsurface will play a major factor in
	peak	indication of	determining when SEE is complete or
	removal rate	significant	sufficient. The mass removal rate will be
		dedine in mass	closely monitored and will be optimized by
		removal by	using pressure cycling events. Toward the
		SEE. This	end of the operational period, the mass
		target is	removal rates will be modest when compared
		consistent with	to the peak removal rates (typically less than
		removal rate	10 percent of the rate observed at peak
		trends observed	operations). Contaminant mass located
		at other sites	around the perimeter of the TTZ may
		and provides	contribute a continuing source of mass for
		some	removal by the SEE system, which could
		accommodation	mask the progress of mass removal within the
		for the	TTZs, so the contribution of perimeter/interior
		uncertain mass	extraction wells may be evaluated for mass
		present and the	removal towards the end of operations to
		uncertain peak	identify any perimeter influx. Continued
		extraction rate.	operation below the 10 percent of peak
		The actual site-	removal rate may be implemented depending
		specific removal	on the significance of continued mass
		rate curve will	removal, the status of COC concentrations
		be evaluated to	(e.g., benzene) in extracted fluids, and the
		contirm or	need/ability for EBH to achieve further
		adjust the	degradation based on data collected during
		appropriateness	the EBR field test.
		of this value to	
		represent a	
		condition of	
		diminishing	
		retums.	
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5/4/16 Weekly Progress Report

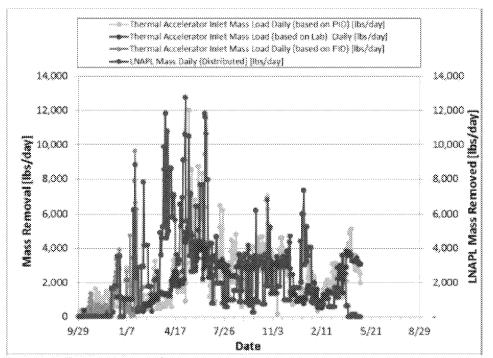


Figure 4. Daily Mass Removed

Analysis: Vapor recovery alone was at more than 3000 lbs per day, up to 25% of peak removal rate; Criteria for termination of steam injection has not been met. Figure indicates

daily LNAPL recovery rate has dropped off only due to termination of steam injection, However the tally in the weekly reports show that 35,254 gallons of LNAPL were recovered between the week the steam injection system was shut down and the extraction system terminated, and there was still LNAPL being recovered at the time the extraction system was shut down.

The 5/4/16 weekly report summarizes total mass recovery from SEE system at the time of shutdown and dismantling, showing LNAPL mass recovery was slightly more than 50% of total liquid and vapor removal

Total Mass Removed in Vapor Based on	J. 18	76
Photoionization Detector (PID) Readings	1,257,290*	lbs
Total Mass Removed as NAPL	1,391,026	lbs
Average Daily NAPL Mass Removal Last Week	0	lbs/day
Total Vapor and Liquid Mass Removal (based on		line.
PID readings)	2,648,316	uy

IV. Criteria for completion of pressure cycling:

Pressure cycling had terminated with the termination of the steam injection system in early March.

V. Criteria for Boiling Temperatures

Table 5-2 SEE to EBR Transition Criteria Monitoring:

Subsurface Temperature	Varies by Depth (higher boiling temperatures with depth – see Figure 5.3.	17 individual TMPs will be equipped with 15-24 vertical temperature measurement locations per TMP, in addition, each SIW and MPE well will be equipped with the infrastructure for a co-located TMP to be installed for temperature measurements to be collected. Co-located TMPs will be permanently installed for the 18 deep SIWs in the LSZ and will monitor the temperature at
	in Appendix D of the RD/RAWP)	the top, middle and bottom of these wells. Two mobile temperature arrays in the CZ and two mobile temperature arrays in the UWBZ will be used to monitor temperatures in the remaining MPEs and SIWs (top, middle and bottom depths). Temperature monitoring of the SIW/MPE wells, along with
Proceedation of	Commodation of	extracted fluid and vapor temperatures, will supplement the 17 individual TMPs to monitor temperature distribution at the site.

Final RD/RAWP (May 2014): Table 4-2: SEE to EBR Transition Criteria:

SEE to EBR Transition Criteria Table 4-2

Subsurface Varies by Numerical Efforts will be made during operations to Temperature Depth thermal inject steam throughout the TTZ to target (higher modeling of achievement of boiling point temperatures for	Parameter	Target Criteria	Bases for Target Criteria	Description
temperatures with depth—specific boiling specific boiling points. 2		Depth (higher boiling temperatures with depth – see Figure 53, in Appendix D of the	thermal modeling of TTZs supported by depth- specific boiling	inject steam throughout the TTZ to target achievement of boiling point temperatures for groundwater throughout the TTZ. A steam zone will be generated and maintained where possible with the goal of pushing steam across the TTZ to form a steam zone between injection and extraction wells, with breakthrough of steam demonstrated at extraction wells, it is anticipated that a steam zone will not be able to be created and maintained in the LPZ. Other areas of low permeability may also be discovered during operation that limit achievement of target temperatures. Operational adjustments will be made where possible to increase temperatures in such zones that are slower to reach target temperatures. The energy balance will be used to support evaluation of achieving the temperature goal. Shut-down of steam will only be considered after achieving boiling point temperatures throughout the TTZ with the exception of the LPZ and other potential areas of low permeability and provided that operational adjustments are made to attempt to achieve the temperature

Soil temperatures starting to decline a time extraction system was shut off and no longer a mechanism to cool the site down, the concern now is that hot mobile contaminants will spread if not contained.

5/4/16 Weekly Progress Report:

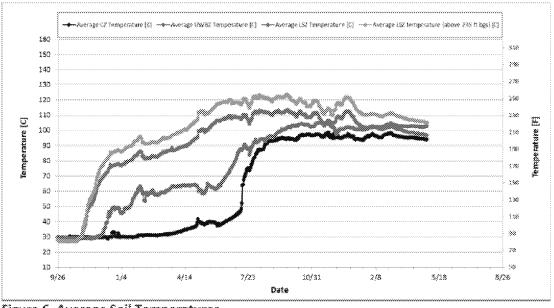


Figure 6. Average Soil Temperatures

